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March 6, 2013

Via ECF Filing

Honorable Peter G. Sheridan, USDJ
United States District Court
for the District of New Jersey
Clarkson S. Fisher Bldg. & US Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: Bayliss v. New Jersey State Police, *et al.*
Civil Action No. 11-cv-0890**

**State Troopers Fraternal Association of N.J., Inc. v.
State of New Jersey, *et al.*
Civil Action No. 13-cv-1065**

Dear Judge Sheridan:

The undersigned's firm represents New Jersey State Police Sergeant Richard Wambold who is named as a defendant in the matter *Bayliss v. New Jersey State Police, et al.*, Civil Action No. 11-cv-0890. This matter is currently pending before the Honorable Mary L. Cooper, USDJ and the Honorable Louis H. Goodman, USMJ. In *Bayliss*, Plaintiff alleges Sergeant Wambold and another State Police Trooper engaged in excessive force, among other claims.

It has come to our attention that one of the State Troopers' unions, the State Troopers Fraternal Association of New Jersey, Inc. ("STFA"), has filed an Order to Show Cause in *STFA v. State of New Jersey, et al.*, Civil Action No. 13-cv-1065 which is before Your Honor. I am writing to bring to the Court's attention that the *Bayliss* and *STFA* lawsuits involve related issues. Specifically, pursuant to the Verified Complaint, the State Police Office of Professional Services informed STFA President Christopher Burgos that they intended to interview him with regard to documents that had come into his possession that were ultimately forwarded to a lawyer who also represents the STFA. (Verified Complaint, para. 11).

My Partner, Charles J. Sciarra, Esq., eventually received a copy of the documents at issue in the Internal Affairs investigation referenced in the *STFA* Verified Complaint. The documents involve the State Police's investigation into the conduct of Sergeant Wambold and are thus highly relevant to the *Bayliss* matter.

The parties' retention of these documents is an issue currently pending before Judge

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STFA v. State of New Jersey, et al.

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Goodman. On February 27, 2013, Judge Goodman entered a pretrial scheduling Order directing the State Police to file its “clawback motion” regarding the subject documents by March 8, 2013. Opposition to that motion is due on March 25, 2013.

I thank the Court for its attention and courtesies.

Very truly yours,

Sciarra & Catrambone, L.L.C.

By: Matthew R. Curran /s/
Matthew R. Curran

MRC\m

cc: Honorable Lois H. Goodman, USMJ (*Via ECF Filing*)
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